

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA

vs.

CHARLES O. EUBANKS,

also known as "Chuckie,"

also known as "Trouble,"

MICHAEL JACKSON,

also known as "Way Way,"

THOMAS L. HAWKINS,

also known as "T-Boy,"

MARTEL D. MULLINS,

also known as "Foe Baby," and

MARK O. COOPER

No. 07 CR 50058

Violations: Title 18, United States

Code, Sections 924(c)(1)(A) and 1951(a)

**FILED**  
NOV 20 2007  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

COUNT ONE

The DECEMBER 2006 GRAND JURY charges:

Between at least July 3, 2007 and August 2, 2007, at Rockford, in the Northern District of Illinois, Western Division,

CHARLES O. EUBANKS,  
also known as "Chuckie,"  
also known as "Trouble,"  
MICHAEL JACKSON,  
also known as "Way Way,"  
THOMAS L. HAWKINS,  
also known as "T-Boy,"  
MARTEL D. MULLINS,  
also known as "Foe Baby," and  
MARK O. COOPER,

defendants herein, did conspire with each other and with others, known and unknown to the Grand Jury, to commit robberies which obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by use of actual and threatened force, violence, and fear of injury to the persons

of employees of several Rockford businesses known to the grand jury, took and attempted to take from the presence of said employees, property belonging to, and in the custody, control, and possession of the businesses, which were then engaged in the purchase and sale of items in interstate commerce.

In furtherance of the conspiracy and to accomplish its unlawful objectives, the defendants committed and caused to be committed the following overt acts, among others, in the Northern District of Illinois:

(a) on or about July 3, 2007, one or more of the defendants robbed West State Food Mart, 2907 West State Street, Rockford, Illinois;

(b) on or about July 7, 2007, one or more of the defendants robbed Chase 8 Auto Sales, 1711 Broadway, Rockford, Illinois;

(c) on or about July 13, 2007, one or more of the defendants robbed Soto's Jewelry, 1126 South Main Street, Rockford, Illinois;

(d) on or about July 16, 2007, one or more of the defendants robbed Checks For Cash, 2949 11<sup>th</sup> Street, Rockford, Illinois;

(e) on or about July 20, 2007, one or more of the defendants robbed Victory Lane Auto Sales, 2805 11<sup>th</sup> Street, Rockford, Illinois;

(f) on or about July 27, 2007, one or more of the defendants robbed RB's Auto Sales, 2701 11<sup>th</sup> Street, Rockford, Illinois;

(g) on or about July 31, 2007, one or more of the defendants robbed Engelwood Beauty Supply, 515 Marchesano Drive, Rockford, Illinois; and

(h) on or about August 2, 2007, one or more of the defendants robbed Soto's Jewelry,  
1126 South Main Street, Rockford, Illinois;

All in violation of Title 18, United States Code, Section 1951(a).

**COUNT TWO**

The DECEMBER 2006 GRAND JURY further charges:

On or about July 3, 2007, at Rockford, in the Northern District of Illinois, Western Division,

MICHAEL JACKSON,  
also known as "Way Way,"  
THOMAS L. HAWKINS,  
also known as "T-Boy," and  
MARTEL D. MULLINS,  
also known as "Foe Baby,"

defendants herein, did commit a robbery which obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by use of actual and threatened force, violence, and fear of injury to the person of a West State Food Mart employee known to the grand jury, took from the presence of said employee, property consisting of United States currency belonging to, and in the custody, control, and possession of West State Food Mart, 2907 West State Street, Rockford, Illinois, a business then engaged in the purchase and sale of groceries and other products in interstate commerce;

In violation of Title 18, United States Code, Section 1951(a).

**COUNT THREE**

The DECEMBER 2006 GRAND JURY further charges:

On or about July 3, 2007, at Rockford, in the Northern District of Illinois, Western Division,

MICHAEL JACKSON,  
also known as "Way Way,"  
THOMAS L. HAWKINS,  
also known as "T-Boy," and  
MARTEL D. MULLINS,  
also known as "Foc Baby,"

defendants herein, during and in relation to a crime of violence, namely the offense described in  
Count Two of this indictment, knowingly used and carried a firearm;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT FOUR**

The DECEMBER 2006 GRAND JURY further charges:

On or about July 7, 2007, at Rockford, in the Northern District of Illinois, Western Division,

THOMAS L. HAWKINS,  
also known as "T-Boy,"

defendant herein, did commit a robbery which obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendant, by use of actual and threatened force, violence, and fear of injury to the person of a Chase 8 Auto Sales employee known to the grand jury, took from the presence of said employee, property consisting of United States currency belonging to, and in the custody, control, and possession of Chase 8 Auto Sales, 1711 Broadway, Rockford, Illinois, a business then engaged in the purchase and sale of automobiles in interstate commerce;

In violation of Title 18, United States Code, Section 1951(a).

**COUNT FIVE**

The DECEMBER 2006 GRAND JURY further charges:

On or about July 7, 2007, at Rockford, in the Northern District of Illinois, Western Division,

THOMAS L. HAWKINS,  
also known as "T-Boy,"

defendant herein, during and in relation to a crime of violence, namely the offense described in

Count Four of this indictment, knowingly used and carried a firearm;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT SIX**

The DECEMBER 2006 GRAND JURY further charges:

On or about July 13, 2007, at Rockford, in the Northern District of Illinois, Western Division,

MICHAEL JACKSON,  
also known as "Way Way,"

defendant herein, did commit a robbery which obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendant, by use of actual and threatened force, violence, and fear of injury to the person of a Soto's Jewelry employee known to the grand jury, took from the presence of said employee, property consisting of jewelry belonging to, and in the custody, control, and possession of Soto's Jewelry, 1126 South Main Street, Rockford, Illinois, a business then engaged in the purchase and sale of jewelry in interstate commerce;

In violation of Title 18, United States Code, Section 1951(a).

**COUNT SEVEN**

The DECEMBER 2006 GRAND JURY further charges:

On or about July 16, 2007, at Rockford, in the Northern District of Illinois, Western Division,

THOMAS L. HAWKINS,  
also known as "T-Boy,"

defendant herein, did commit a robbery which obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendant, by use of actual and threatened force, violence, and fear of injury to the person of a Checks For Cash employee known to the grand jury, took from the presence of said employee, property consisting of United States currency belonging to, and in the custody, control, and possession of Checks For Cash, 2949 11<sup>th</sup> Street, Rockford, Illinois, a business then engaged in lending money in interstate commerce;

In violation of Title 18, United States Code, Section 1951(a).

**COUNT EIGHT**

The DECEMBER 2006 GRAND JURY further charges:

On or about July 20, 2007, at Rockford, in the Northern District of Illinois, Western Division,

CHARLES O. EUBANKS,  
also known as "Chuckie,"  
also known as "Trouble," and  
THOMAS L. HAWKINS,  
also known as "T-Boy,"

defendants herein, did commit a robbery which obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by use of actual and threatened force, violence, and fear of injury to the person of a Victory Lane Auto Sales employee known to the grand jury, took from the presence of said employee, property consisting of United States currency belonging to, and in the custody, control, and possession of Victory Lane Auto Sales, 2805 11<sup>th</sup> Street, Rockford, Illinois, a business then engaged in the purchase and sale of automobiles in interstate commerce;

In violation of Title 18, United States Code, Section 1951(a).

**COUNT NINE**

The DECEMBER 2006 GRAND JURY further charges:

On or about July 20, 2007, at Rockford, in the Northern District of Illinois, Western Division,

CHARLES O. EUBANKS,  
also known as "Chuckie,"  
also known as "Trouble," and  
THOMAS L. HAWKINS,  
also known as "T-Boy,"

defendants herein, during and in relation to a crime of violence, namely the offense described in  
Count Eight of this indictment, knowingly used and carried a firearm;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT TEN**

The DECEMBER 2006 GRAND JURY further charges:

On or about July 27, 2007, at Rockford, in the Northern District of Illinois, Western Division,

CHARLES O. EUBANKS,  
also known as "Chuckie,"  
also known as "Trouble,"

defendant herein, did attempt to commit a robbery which obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendant, by use of actual and threatened force, violence, and fear of injury to the person of a RB's Auto Sales employee known to the grand jury, attempted to take from the presence of said employee, property belonging to, and in the custody, control, and possession of RB's Auto Sales, 2701 11<sup>th</sup> Street, Rockford, Illinois, a business then engaged in the purchase and sale of automobiles in interstate commerce;

In violation of Title 18, United States Code, Section 1951(a).

**COUNT ELEVEN**

The DECEMBER 2006 GRAND JURY further charges:

On or about July 27, 2007, at Rockford, in the Northern District of Illinois, Western Division,

CHARLES O. EUBANKS,  
also known as "Chuckie,"  
also known as "Trouble,"

defendant herein, during and in relation to a crime of violence, namely the offense described in  
Count Ten of this indictment, knowingly used and carried a firearm;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT TWELVE**

The DECEMBER 2006 GRAND JURY further charges:

On or about July 31, 2007, at Rockford, in the Northern District of Illinois, Western Division,

CHARLES O. EUBANKS,  
also known as "Chuckie,"  
also known as "Trouble," and  
MICHAEL JACKSON,  
also known as "Way Way,"

defendants herein, did commit a robbery which obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by use of actual and threatened force, violence, and fear of injury to the person of an Englewood Beauty Supply employee known to the grand jury, took from the presence of said employee, property consisting of United States currency belonging to, and in the custody, control, and possession of Englewood Beauty Supply, 515 Marchesano Drive, Rockford, Illinois, a business then engaged in the purchase and sale of beauty supplies in interstate commerce;

In violation of Title 18, United States Code, Section 1951(a).

**COUNT THIRTEEN**

The DECEMBER 2006 GRAND JURY further charges:

On or about July 31, 2007, at Rockford, in the Northern District of Illinois, Western Division,

CHARLES O. EUBANKS,  
also known as "Chuckie,"  
also known as "Trouble," and  
MICHAEL JACKSON,  
also known as "Way Way,"

defendants herein, during and in relation to a crime of violence, namely the offense described in  
Count Twelve of this indictment, knowingly used and carried a firearm;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT FOURTEEN**

The DECEMBER 2006 GRAND JURY further charges:

On or about August 2, 2007, at Rockford, in the Northern District of Illinois, Western Division,

CHARLES O. EUBANKS,  
also known as "Chuckie,"  
also known as "Trouble,"  
MICHAEL JACKSON,  
also known as "Way Way," and  
MARK O. COOPER,

defendants herein, did commit a robbery which obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendants, by use of actual and threatened force, violence, and fear of injury to the person of a Soto's Jewelry employee known to the grand jury, took from the presence of said employee, property consisting of jewelry belonging to, and in the custody, control, and possession of Soto's Jewelry, 1126 South Main Street, Rockford, Illinois, a business then engaged in the purchase and sale of jewelry in interstate commerce;

In violation of Title 18, United States Code, Section 1951(a).

**COUNT FIFTEEN**

The DECEMBER 2006 GRAND JURY further charges:

On or about August 2, 2007, at Rockford, in the Northern District of Illinois, Western  
Division,

CHARLES O. EUBANKS,  
also known as "Chuckie,"  
also known as "Trouble,"  
MICHAEL JACKSON,  
also known as "Way Way," and  
MARK O. COOPER,

defendants herein, during and in relation to a crime of violence, namely the offense described in  
Count Fourteen of this indictment, knowingly used and carried a firearm;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

A TRUE BILL:

  
FOREPERSON

  
UNITED STATES ATTORNEY

FILED

NOV 20 2007

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT.

No.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA

VS.

CHARLES O. EUBANKS, et al.

INDICTMENT

Violation(s): Title 18, United States Code,  
Sections 924(c)(1)(A) and 1951(a)

A true bill

Prosecutor

Filed in open court this 20<sup>th</sup> day of November A.D. 2007

Clerk

Bail, \$